



Region 3 Headquarters

Bozeman, Montana

406-994-4042

May 1, 2019

To whom it may concern,

The Department of Montana Fish, Wildlife and Parks (FWP) has reviewed comments received on a project to restore native westslope cutthroat trout (WCT) to the headwaters of Tepee Creek. A scoping letter was mailed to potential interested parties on February 6<sup>th</sup>, 2019. After reviewing comments, FWP moved forward with development of an Environmental Assessment. The EA was mailed to interested parties, landowners downstream of Tepee Creek, and was posted March 28<sup>th</sup> on the FWP public notices webpage. Based on comments received, this letter is a notification of a Decision Notice to proceed with the project.

Tepee Creek is a tributary to Grayling Creek which originates in Yellowstone National Park approximately 20 Miles NNE of the town of West Yellowstone. Grayling Creek flows in a southerly direction and enters Hebgen Reservoir approximately 2.5 miles northwest of the junction of highways 287 and 291. (see attached map).

The proposed project is intended to restore genetically pure WCT to approximately seven miles of historically occupied stream habitat in the headwaters of Tepee Creek. Currently, Tepee Creek is occupied by a highly hybridized population of fish, westslope cutthroat trout x rainbow trout x Yellowstone cutthroat trout. Prior to non-native fish removals, a fish barrier will be blasted out of bedrock by United States Forest Service personnel under a Categorical Exclusion (Decision Memo dated June 11, 2015).

The following Decision Notice describes the project in more detail and presents comments by interested parties and responses by FWP

Thank you for your consideration of this proposed project to restore native fish to the waters of Montana.

Sincerely,

  
Mark Deleray

Region – 3 Regional Supervisor





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**DECISION NOTICE****Environmental Assessment for the Reintroduction of Native  
Westslope Cutthroat Trout in Tepee Creek by Removal of Non-native Trout with Rotenone**

Montana Department of Fish, Wildlife & Parks  
1400 South 19th Avenue, Bozeman MT, 59718

**Description of Proposed Action**

Tepee Creek is a tributary to Grayling Creek which originates in Yellowstone National Park approximately 20 Miles NNE of the town of West Yellowstone. Grayling Creek flows in a southerly direction and enters Hebgen Reservoir approximately 2.5 miles northwest of the junction of highways 287 and 291).

The proposed project is intended to restore genetically pure westslope cutthroat trout (WCT) to approximately seven miles of historically occupied stream habitat in the headwaters of Tepee Creek. Currently, Tepee Creek is occupied by a highly hybridized population of fish 52% WCT x 27% Yellowstone Cutthroat Trout (YCT) x 21% Rainbow Trout (RBT). It is presumed that non-native YCT were historically stocked in the headwaters of Tepee Creek early in the 20th century while RBT moved upstream from Hebgen Lake and lower Grayling Creek. All hybridized trout would be removed upstream of the barrier using an EPA-registered fish toxicant before restocking.

Before such a removal, an upstream migration barrier would be blasted along lower Tepee Creek (see attached map) to prevent the re-invasion of nonnative trout into the proposed recovery area. Construction of the fish barrier has been authorized under a Categorical Exclusion by the Hebgen Lake Ranger District in a Decision Memo dated June 11, 2015. While alterations would be made to the naturally occurring features of the stream channel, the modifications would retain a natural appearance. Implementation of the Forest Service's Decision Memo is contingent on MFWP's authorization to remove non-native trout and restock with genetically pure WCT. Any construction activities would be permitted as required by State and Federal statutes.

Once treated waters are deemed fishless, FWP proposes to reintroduce genetically pure WCT from neighboring populations within the upper Missouri River Basin. FWP anticipates that non-native fish removals would take two years and reintroduction of nearest neighbor WCT would take three years.

Westslope cutthroat trout are considered a species of concern by the State of Montana and a sensitive species by the U.S. Forest Service. Many similar projects have occurred within the upper Missouri River Basin in recent decades. Cumulatively, these projects help prevent the extinction of WCT and listing under the Endangered Species Act. Montana Fish, Wildlife & Parks is mandated through State of Montana statutes to conduct projects to improve the status of imperiled species. Additionally, Montana

Fish, Wildlife & Parks Statewide Fisheries Management Plan specifies a goal of 20% occupancy and security of WCT in their historic range.

## Alternatives to the Proposed Action

### *Alternative 1 – No action*

The no action alternative will affect no change in the Tepee Creek Fishery. The hybrid trout fishery in Tepee Creek, will remain the same. The “No Action” alternative will not fulfill the State’s obligation to ensure the long-term persistence of WCT distributed across its historical range (FWP 2007). Although the “No Action” alternative will meet the goals of WCT conservation, it will avoid any temporary impacts from increased foot and helicopter traffic. The selection of the “No Action” alternative will not affect trail access for the week during piscicide treatment. Temporary impacts to non-target aquatic invertebrates and to amphibians will be avoided, and there will be no temporary loss of non-native trout fisheries in Tepee Creek.

The “No Action” alternative does not meet the management goals of FWP for WCT and their long-term persistence. Hence, the “No Action” alternative is not considered the preferred alternative. The “No Action” alternative does not move the status of WCT populations in Montana in a direction away from further protection, such as listing under the Endangered Species Act. Such a listing could have wide ranging ramifications on land use decisions, particularly on federal lands.

### *Alternative 2 – Proposed Action: Restoration of WCT in Tepee Creek through the removal of non-native trout using rotenone and restocking of Cutthroat Trout.*

This alternative benefits WCT through an increase in number of stream miles inhabited by WCT. Approximately 7 miles of Tepee Creek and its tributaries will be treated with rotenone to remove non-native trout. Replication of at-risk populations within the Madison or equivalent drainage is important in reducing extinction risk. WCT obtained from local populations would BE used for reintroductions. Using locally adapted WCT populations would protect and preserve a portion of their genetic legacy. Under the proposed action, non-native trout would be removed with rotenone. There will be some lost angling opportunity in the period after treatment and before Tepee Creek holds fishable populations within the treatment reach— typically 3 to 5 years.

Under this alternative, there would be an increased presence of fisheries personnel during piscicide treatments and during restoration efforts, typically two or three weeks for 2 to 3 years. Non-mechanized equipment will be the first choice in accessing the project area; however, a helicopter may be utilized to transport equipment to the project site.

### *Alternative 3 – Mechanically remove non-native trout from Tepee Creek.*

Electrofishing has been used as a fish removal tool with success in small simplistic streams. Typically, a stream that is a candidate for electrofishing removals will be less than 2 miles in length and have very little complexity (woody debris, overhanging cover, and undercut banks). Electrofishing removals in small uncomplicated systems require multiple crews for two to three weeks a year for 3 to 6 years. The instream features, complexity and size of Tepee Creek preclude mechanical removal as an option. Since the primary goal of this project is to reestablish a genetically pure WCT population, there can be zero tolerance for hybrids in the restored stream – i.e. one missed fish during removal could contaminate the genetic integrity of reintroduced WCT. This alternative was removed from further analysis because it will not meet the goals of the project.



## Public Review Process

### Public scoping prior to EA:

- Public scoping notices were mailed to five landowners adjacent to Grayling Creek and downstream to Hebgen Reservoir as well as an interested party list, e.g. tribes and non-governmental organizations (2/6/2019). The scoping notice was also posted on the FWP Public Notices webpage (2/6/2019).
- Two comments were received during the 30-day scoping period. One comment supported the project and one did not.
- One e-mail was received requesting clarification on methods to create a fish barrier using explosives to create a waterfall out of bedrock.

### Summary of Public Comment During Scoping

The non-supporting comment letter cited the recent treatment of Grayling Creek by Yellowstone National Park and a reduced recreational fishery there.

**Response:** A reduced fishery in Grayling Creek should be temporary. Treatment of Tepee Creek would require deactivation of rotenone with potassium permanganate. As per FWP policy, no rotenone should pass the 30-minute travel time mark below the point of detoxification.

The commenter also indicated there are a lot of other places other than the Grayling Creek drainage that could be used for these experiments.

**Response:** FWP actively seeks out potential project areas based on the potential for a fish barrier. These opportunities are rare, especially sites conducive to blasting. Construction of a concrete fish barrier, depending on size can cost upwards of \$250,000; in this project, total blasting costs would be less than \$10,000. The remoteness of Tepee Creek also mitigates the risk of intentional or unintentional sabotage through illegal movement of non-native trout.

### Summary of Public Comment on Environmental Assessment

#### Public comment on EA:

- Notices of the draft EA were mailed to five landowners adjacent to Grayling Creek and downstream to Hebgen Reservoir as well as an interested party list, e.g. tribes and non-governmental organizations (3/28/2019). The scoping notice was also posted on the FWP Public Notices webpage. A legal notice was published in the Bozeman Chronicle (3/28/2019).
- No comments were received on the draft Environmental Assessment

## Decision

Based upon comments received on scoping notices and lack of comment on the Environmental Assessment, as well as the analysis of benefits and risks associated with the project; it is my decision to go forward with the proposed action of removal of non-native trout in Tepee Creek. Following removal of non-native trout, wild westslope cutthroat trout obtained from nearby drainages will be replicated in Tepee Creek. I find there to be no significant impacts on the human and physical environment associated with this project. Therefore, I conclude that the Environmental Assessment is the appropriate level of analyses and the project should proceed.

Questions regarding the Decision Notice should be mailed to:

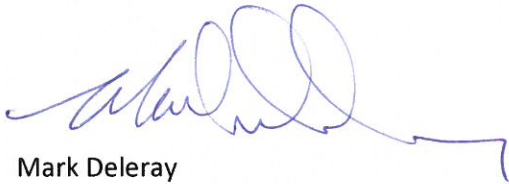
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Mark Deleray

Region 3 Supervisor